



October 17, 2017

VIA EMAIL to TRSREPORTS@FCC.GOV

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St, SW
Washington, DC 20554

Re: Notification of Substantive Change, *Structure and Practices of Video Relay Service Program*, CG Docket No. 10-51; *Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123

Dear Ms. Dortch,

Pursuant to 47 C.F.R. § 64.606(f)(2), Purple Communications, Inc. ("Purple") hereby notifies the Commission of a substantive change to its video relay service ("VRS"). On June 12, 2017, Purple executed an agreement ("Agreement") engaging CSDVRS, LLC. d/b/a ZVRS ("ZVRS") to provide interpreter services to Purple for overflow VRS calls ("Overflow Calls") in compliance with the mandatory minimum standards set forth in 47 C.F.R. § 64.604. Under the Agreement, ZVRS shall furnish commercially reasonable and adequate facilities, equipment, network hardware, software, connections and other infrastructure necessary to handle Overflow Calls.

Purple certifies that this change does not affect its continuing compliance with mandatory minimum standards applicable to its provision of VRS.

Respectfully submitted,

/s/

Gregory Hlibok
Chief Legal Officer
ZVRS Holding Company, parent company of
Purple Communications, Inc.
595 Menlo Drive
Rocklin, CA 95765

cc: David Rolka, Rolka Loube Associates LLC
Amanda Coby, Rolka Loube Associates LLC
Lydia Yomogida, Purple Communications, Inc.